

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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KeySpan Energy Delivery Company)	
Petition for Approval of its Demand-Side)	D.T.E. 02-31
Management Program for the Five- Year period)	
May 1, 2002 through April 30, 2007)	
)	
)	

PETITION TO INTERVENE
ON BEHALF OF THE
COMMONWEALTH OF MASSACHUSETTS
DIVISION OF ENERGY RESOURCES

The Division of Energy Resources of the Commonwealth of Massachusetts (“DOER”) hereby petitions for leave to intervene and participate in the above-captioned proceeding, pursuant to M.G.L. c.25A, §6, 11G, c.30A, §§10 and 11, and 220 C.M.R. §1.03.

In support of its request, the Petitioner states the following:

- 1) Petitioner’ s name and address are as follows:

Commonwealth of Massachusetts
Division of Energy Resources
70 Franklin Street, Seventh Floor
Boston, Massachusetts 02110

- 2) Petitioner is the Massachusetts executive agency responsible for establishing and implementing the Commonwealth’ s energy policies and programs (M.G.L. c.25A, §6).

- 3) Pursuant to M.G.L. c.25A, §6, Petitioner is authorized and directed to:

(1) plan, develop, oversee, and operate programs to help consumers understand, evaluate, and select retail energy supplies and related services offered as a consequence of electricity and gas utility restructuring;

(2) develop and administer programs relating to energy conservation, alternative energy development, non-renewable energy supply and

resources development, energy bond authority, energy information and energy emergencies;

(3) advise, assist, and cooperate with other state, local regional, and federal agencies in developing appropriate program and policies relating to energy planning and regulation in the Commonwealth;

(4) develop energy data and information management capabilities to aid energy planning and decision-making; and

(5) promote the development of sound energy education programs.

4) Petitioner's ability to develop and implement consistent governmental policies with respect to the Commonwealth's gas utility industry will be substantially and specifically affected by this proceeding. Because Petitioner is the Commonwealth's agency with primary responsibility for energy policy development, Petitioner's involvement in this case is critical.

5) Petitioner requests the right to participate in all aspects of this case, including, as it deems necessary, the presentation of testimony, cross-examination of witnesses, and the presentation of arguments orally and through briefs.

Respectfully submitted,

COMMONWEALTH OF MASSACHUSETTS
DIVISION OF ENERGY RESOURCES

By its attorney:

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